

Date: October 7th, 1988

Subject: Trip Report--Montana Department of Environmental Sciences
September 27, 1988

From: D. F. Ryan

To: T. F. Payne

On September 27, 1988, a trip was made to Helena to discuss three areas of environmental concern. Representing CFAC were Tom Payne, Jack Canavan, Ken Reick and Don Ryan. Topics of discussion were:

1. Citation for violation of opacity regulations on a paste plant stack.
2. Discussion of a change in the language of the rule covering opacity levels for existing aluminum plants.
3. Request to the Solid Waste Bureau to delay relisting of spent potliner until July 1, 1990.

The following is a summary of the results of these discussions.

1. Paste Plant Citation

The paste plant citation was discussed with Jeff Chaffee, Harry Keltz and Warren Norton of the Air Quality Bureau and Fred Shewman of the Water Quality Bureau.

Ken Reick defined the present system in the Paste Plant and presented three options for compliance using a Lamellar water scrubbing separator. We told them that based upon the Alcan Kitimat use of this system, we would be well within the 40% opacity standards. The following points of interest were brought up.

- A change in the dust suppressant system would not be an equipment change and the pre 1967 opacity standard of 40% would still apply.
- Addition of a pre-heater for the coke might be construed as an equipment change and result a post 1967 opacity standard of 20%. Our opinion is that the Lamellar system could meet the 20% opacity requirement.
- Water disposal is a concern to the WQB. They recommend an incineration process if possible. We will investigate this but the feasibility appears unlikely. We will have to base our scrubber option on the fact that degradation of the north pond, from this effluent, will not occur. A modification to our ground water permit would probably be needed.

- We were given until December 1, 1988 to provide a compliance plan. The AQB agreed to provide a letter outlining what would be provided in the plan and also provide compliance dates. The letter has been received and a copy is attached.

2. Aluminum Plant Opacity Rule

The Montana opacity rule relating to existing aluminum plants is ambiguous in that it was written to cover opacity from potrooms but has been interpreted in the eyes of EPA, to cover the entire aluminum plant. This would require a maximum opacity of 10% for all plant systems rather than the 40% to which most systems would be subjected.


The AQB agrees with the CFAC interpretation rather than EPA's. They have requested that we initiate a rule change by submitting a letter to AQB Chief, Jeff Chaffee which will be presented to the Board of Health with their recommendation for adoption. A copy of the letter is attached and will probably be presented to the Board during their January 1989 meeting.

3. Solid Waste Bureau Meeting on Spent Potlining

The Federal Register notice of September 13, 1988, relisting spent potlining, set an effective date of March 13, 1989 for the relisting. The notice did, however, say that programs maintained by the State can have until July 1, 1990 to implement the relisting. They can make the relisting date earlier if they so choose.

The CFAC contingent met with the Montana Solid Waste Bureau, represented by Roger Thorvilson, Alice Stanley, Barb Jones and Bill Potts, to request that the SWB take advantage of the July 1, 1990 relisting option. Roger Thorvilson was the spokesman for the SWB and said he would consider the option but the decision might be affected by the relisting of ASARCO wastes in the same EPA final rule. If it becomes necessary to address the ASARCO wastes at an earlier date, SPL might have to be included. He was uncertain whether this was a regulatory requirement. He was also concerned about the possible impact of the land ban rule being considered by EPA. A land ban would override a later relisting date.

Any decision relating to the relisting would involve Dr. John Drynan, Director of the Department of Health and Environmental Sciences. We met with Dr. Drynan after the SWB meeting and presented our case to him. He indicated that he would make every effort to support our request.



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Laboratory Superintendent

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